

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
UNITED STATES OF AMERICA :  
v. : Criminal No. 15-0021-1  
WILLIAM J. O'BRIEN III :  
January 31, 2016

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OBJECTION TO ALL UNTIMELY RESPONSES AND MOTIONS  
TIME-BARRED AS MOOT

This Court gave specific instruction in November 2015 that all pre-trial motions were to be filed by January 4, 2016 and responses to these motions filed by January 18, 2016. January 18, 2016 fell on Martin Luther King Jr Day, a Federal Holiday. By Rule, responses were due then on the 19th of January 2016.

All 8 of Defendant's timely motions were responded to by the government on January 21, 2016. Government's Response to Suppression Hearing was filed January 22, 2016. Co-Defendant Hibbs' Motion for Extension of time to file pre-trial motions and "Unopposed Motion for Pre-Trial..." were both filed on January 25, 2016. Co-Defendant Johnson's pro se letter was filed January 25, 2016.


ALL OF THE RESPONSES AND FILED MOTIONS ARE UNTIMELY AND SHOULD BE TIME-BARRED.

As noted on my previous objection to untimeliness, and therefore time-barred, the government is under the same rules and onus as everyone else. The 3rd circuit has clearly delineated such. The government, with unlimited resources, both financial and manpower, has no excuse for not filing responses by January 19th. NONE.

RELIEF REQUESTED:

All untimely responses and motions are to be found time-barred.

Respectfully Submitted,

  
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William J. O'Brien III, D.O.  
Board Certified in Family Practice  
Fellow of the American Academy  
Of Disability Evaluating Physicians

CERTIFICATE OF SERVICE

I hereby verify that on January 31, 2016 a copy of:

OBJECTION TO ALL UNTIMELY RESPONSES AND MOTIONS TIME-BARRED IS MOOT

and

SEVENTEENTH MOTION FOR DISCOVERY

was mailed, via First Class Mail to:

Clerk of Courts  
601 Market Street  
U.S. District Court  
Phila., PA 19106

Beth Leary AUSA  
615 Chestnut Street  
Suite 1250  
Phila., PA 19106

Here at FDC, a legal mail log is kept by the correction officer on each floor. I am on 5 south. This log verifies the date of mailing, aka "mail box" date.

1/31/16  
Date

  
William J. O'Brien III, D.C.